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US Agency for International Development
Mr. Philip M. Henegan
Chief Privacy Officer
1300 Pennsylvania Avenue, NW
Room 2.12-003
Washington, DC 20523-2120

Re: RIN 0412-AA61
Docket ID: AID-2007-0007

Dear Mr. Henegan,

I serve as the Chair of the Board of IREX (International Research & Exchanges), a non-profit organization which administers exchanges and a variety of other programs in Russia, the countries of former Soviet Union, Eastern Europe and increasingly the Middle East. A significant part of our funding comes from USAID.

I write you today to express my grave concern about USAID's proposal to establish a Partner Vetting System to collect and maintain information on individuals who seek USAID assistance or acquisition awards or who work for organizations that do.

Such a proposal is deeply troubling on many levels. It is troubling, first and foremost, because it is unnecessary. There has never been conclusive evidence that USAID funding has gone directly to terrorist organizations or that any organization that has operated with USAID support has been a conduit, witting or unwitting, for funding terrorist activities. The proposal appears to be an effort to extend to all the countries where USAID functions a congressional requirement for enhanced vetting which exists in the West Bank and Gaza. No plausible reason has been given for this. This is alarming indeed. The motivation seems to be simply to collect data for its own sake, with few checks and balances provided as a protection to those giving the information. It appears moreover that the data thus collected will disappear into a black hole: neither the individuals required to provide data nor the organizations for which they work will be told whether or not the individuals "passed" or "failed"; nor, the criteria according to which they were judged.

The extensive collection of personal information will also have a chilling effect on the ability to recruit and retain qualified individuals to serve as board members for international development focused non-profit organizations. Board members already provide their time and support on non-profit boards in a volunteer capacity. Attracting individuals to serve in an increasing litigious and regulatory (Sarbanes-Oxley) environment is already a challenge. Adding the over bearing collection of personal information from board members would provide a significant impediment to the recruitment and retention of board membership. This is clearly counter-productive from a policy standpoint.

For an organization like IREX, it will make the task of administering its USAID funded programs vastly more complex. IREX has over 400 employees in the field. Collecting the required data will in the first instance present an enormous administrative burden, requiring in all likelihood the hiring of extra employees (and thus reducing the substantive value of the USAID dollar). More seriously, it will engender mistrust and apprehension among the individuals concerned, some of which will be directed towards IREX. Many of the countries where we operate are at best incipient democracies with still active traditions of a strong secret police. Requests for personal data in these countries inevitably provoke suspicion and questions regarding the ultimate utilization of the data. It may, as a result, become harder to recruit people to work for us. IREX has recently been expanding its activities to the Middle East—not only exchanges but media training with the objective of promoting a free and open press. This regulation runs directly counter to those efforts-- in precisely those countries of the world, where we need to be working hardest to improve the United States' image.

In the aftermath of 9/11 we have all accepted the necessity of certain measures that in earlier times would have been deemed excessive. The consequences of instituting the PVS described above would be regrettable but understandable and necessary if there were a proven need for collecting the data. But there is none and indeed none has been offered. Institution of the PVS appears to reflect the triumph of a certain mindset, the highly fallacious assumption that the more data we collect even on innocent people, the safer we shall be from terrorism. This is extremely disturbing.

If we add to these concerns the fact that the PVS system lacks any statutory basis and was instituted without regard to a number of necessary procedures, it seems clear that the whole thing has been done hastily without thinking through the consequences. I cannot urge too strongly that you cancel plans to institute a PVS.

Yours Sincerely

A handwritten signature in cursive script, reading "Avis Bohlen".

Avis Bohlen

cc: Jeff Denale, Coordinator for Counterterrorism, USAID (Jdenale@usaid.gov)
Beverly Johnson, USAID/M, (bjohnson@usaid.gov)
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